



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

September 6, 2018

Jane Elizabeth Burdeshaw
Commissioner
Alabama Department of Rehabilitation Services
Alabama's Early Intervention System
602 South Lawrence Street
Montgomery, AL 36104

Dear Commissioner Burdeshaw:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the proposed changes to the eligibility requirements in the State of Alabama's Early Intervention System.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 700 members live and practice in Alabama.

ASHA requests that the Alabama Department of Rehabilitation Services delay the proposed changes until an analysis can be performed on the potential impact of raising the eligibility levels. As proposed, the threshold for identification and eligibility of the early intervention program would be raised from 25% to 33% in the "Developmental Delay" and "Evaluation & Assessment" definitions. Thus, a child between birth and age 3 would then have to demonstrate at least a 33% delay in one or more of the five developmental areas or a 25% delay in two or more of the five developmental areas.

The early years of development are critical to the success of any child and raising the eligibility requirements could have long lasting negative impacts. A study on the narrowing of eligibility criteria by Elbaum, et al., indicates that following a policy change of raising the eligibility threshold, the number of children served decreased and the average age when enrolled in services increased. The study found that changing eligibility criteria reduces early intervention enrollment. Changing eligibility could also delay access to services for children with emergent developmental delays.¹

Effective communication is fundamental to all aspects of human functioning, particularly learning and social interaction. The development of communication skills begins at birth. Families with infants and toddlers (birth–36 months) who are at risk for or have disabilities should receive developmentally supportive care that addresses a broad spectrum of priorities and concerns.

September 6, 2018

Page 2

Thank you for the opportunity to provide comments on the proposed changes to the eligibility requirements in the early intervention program. If you or your staff have any questions, please contact Shannon Morey, ASHA's director of state health care and education affairs, at smorey@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Elise Davis-McFarland".

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President

¹Elbaum, Batya; Celimli-Aksoy, Seniz; Marshall, Jennifer T.; Berkovits, Michelle D. (2016). How does the narrowing of eligibility criteria affect enrollment in part C early intervention? *Journal: Infants and Young Children, Vol. 30, No. 1*, 28-40.